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UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC.

Plaintiff,

V.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING
LLC

Defendants

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL**

Trial Date: October 10, 2017

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants submit this motion for an order to file under seal exhibits in support of their Motion to Quash and Motion for Protective Order Regarding Subpoenas to Yoo and Gonzalez. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1 to the Declaration of Arturo Gonzalez	Highlighted Portions	Non-parties Anthony Levandowski and Lior Ron
Exhibits 2-3 to the Declaration of Arturo Gonzalez	Entire Documents	Non-parties Anthony Levandowski and Lior Ron (Entire Documents) Defendants Uber and Ottomotto (Blue Highlighted Portions)

The blue-highlighted portions in Exhibits 2-3 contain the email addresses and phone numbers of high-ranking company executives, whose contact information may become compromised if disclosed to the public. Defendants seek to seal this information in order to protect the privacy of these executives, as prominent individuals in this lawsuit are currently the subject of extensive media coverage. (Tapernoux Decl. ¶ 3.)

The yellow-highlighted portion in Exhibit 1 and the entireties of Exhibits 2-3 to the Declaration of Arturo Gonzalez contain information relating to the Stroz Report, which is currently the subject of several pending motions requesting a protective order over this material. (Dkt. 1682, 1684, 1685, and 1686.) (Tapernoux Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the documents at issue, with accompanying chamber copies.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on September 24, 2017.

For the foregoing reasons, Defendants request that the Court enter the accompanying Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and designate the service copies of these documents as "CONFIDENTIAL."

1 Dated: September 24, 2017

MORRISON & FOERSTER LLP

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3 By: /s/ Arturo J. González
4 ARTURO J. GONZÁLEZ

5 Attorneys for Defendants
6 UBER TECHNOLOGIES, INC.
7 and OTTOMOTTO LLC

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